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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

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13 SCOTT REESE,)
14 Plaintiff,) Case No.: 2:22-cv-01722-DJA
15 v.)
16 KILOLO KIJAKAZI,)
16 Acting Commissioner of Social Security,)
17 Defendant.)
18)
19)
20)
21)
22)
23)
24)
25)
26)

) **STIPULATION TO VOLUNTARY
REMAND PURSUANT TO SENTENCE
FOUR OF 42 U.S.C. § 405(g) AND TO
ENTRY OF JUDGMENT FOR
PLAINTIFF**

21 IT IS HEREBY STIPULATED by and between the parties, through their undersigned
22 attorneys, and with the approval of the Court, that this action be remanded for further administrative
23 action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.

24 On remand, the Appeals Council will remand the case to an administrative law judge (ALJ) for
25 a new decision. The ALJ will further develop the record as necessary, offer Plaintiff the opportunity
26 for a new hearing, and issue a new decision.

1 The parties further request that the Clerk of the Court be directed to enter a final judgment in
2 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

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4 Dated: April 20, 2023 Respectfully submitted,

5 LAW OFFICES OF LAWRENCE D. ROHLFING, INC., CPC
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7 */s/ Marc V. Kalagian*
MARC V. KALAGIAN
(*as authorized via email on April 19, 2023)
8 Attorney for Plaintiff

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10 Dated: April 20, 2023 Respectfully submitted,

11 JASON M. FRIERSON
United States Attorney

12 */s/ David Priddy*
13 DAVID PRIDDY
Special Assistant United States Attorney
14 Attorneys for Defendant

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16 IT IS SO ORDERED:
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HON. DANIEL J. ALBREGTS
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: April 21, 2023

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 20, 2023

/s/ *David Priddy*
DAVID PRIDDY
Special Assistant United States Attorney